

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

INTELLECTUAL VENTURES I, LLC;
INTELLECTUAL VENTURES II, LLC,

Plaintiffs,

v.

EMC CORP.,

NETAPP, INC.

Case No. 1:16-cv-010860-PBS

Case No. 1:16-cv-010868-PBS

**PLAINTIFFS INTELLECTUAL VENTURES I, LLC AND INTELLECTUAL
VENTURES II, LLC'S MOTION FOR RELIEF FROM JUDGMENT PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 60**

Plaintiffs (collectively “Intellectual Ventures”) hereby move for relief from judgment pursuant to Federal Rule of Civil Procedure 60. In particular, Intellectual Ventures moves for an Order vacating and subsequently re-entering the Court’s order granting summary judgment with respect defendant NetApp regarding U.S. Patent 6,516,442 (Dkt. # 483), and that the Court vacate and subsequently re-enter its judgment entered with respect to EMC and Lenovo with clarifications regarding the finality of the judgment as to all patents-in-suit as further detailed in the accompanying memorandum in support. This motion is based upon this motion, the accompanying memorandum, the accompanying declaration of James Weisfield and the exhibits thereto, and such other matters and argument which the Court may properly consider.

September 11, 2020

RUSS AUGUST & KABAT

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INTELLECTUAL VENTURES II, LLC,

LOCAL RULE 7.1 CERTIFICATION

IV's counsel hereby certifies under Local Rule 7.1 that on September 8, 2020, IV's counsel contacted counsel for EMC and NetApp regarding this motion, and that on September 10, 2020, EMC's and NetApp's counsel each stated that they would not take a position before this motion was filed.

/s/ Brian D. Ledahl
Brian D. Ledahl

CERTIFICATE OF SERVICE

I hereby certify that the counsel of record who are deemed to have consented to electronic service are being served on September 11, 2020, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Brian D. Ledahl